

# ATTACHMENT 3



## Activity in Case 7:23-cv-03586-CS The Wave Studio, LLC v. Trivago N.V. et al Notice of Appearance

**B. Robert Liu, Esq.** <[robert.liu@balancelawfirm.com](mailto:robert.liu@balancelawfirm.com)>

Mon, May 19, 2025 at 4:40 PM

To: Francesca Germinario <[francesca@warrenkashwarren.com](mailto:francesca@warrenkashwarren.com)>

Cc: Stephen Hudspeth <[stephen.hudspeth@balancelawfirm.com](mailto:stephen.hudspeth@balancelawfirm.com)>, Dayna Cooper <[dayna.cooper@balancelawfirm.com](mailto:dayna.cooper@balancelawfirm.com)>,

"The Wave Studio, LLC: Consolidated New York Cases" <[13-9239@cases.warrenlex.com](mailto:13-9239@cases.warrenlex.com)>, Mike Cilento

<[michael@ilawco.com](mailto:michael@ilawco.com)>

Hi Francesca,

Following up on this. We are evaluating if we should consent to your motion to file an amended complaint. But do you have a draft Third Amended Complaint readily available? If so, can you please share a copy with us?

Thank you,

Robert

On Sun, May 18, 2025 at 7:20 PM B. Robert Liu, Esq. <[robert.liu@balancelawfirm.com](mailto:robert.liu@balancelawfirm.com)> wrote:

Hi Francesca,

Thank you for getting back to me on a weekend day.

Just wanted to confirm that there is not a proposed amended complaint with redlined edits showing changes from the current operative complaint. Is that correct?

Best regards,

Robert

B. Robert Liu, Esq.  
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On Sun, May 18, 2025 at 6:13 PM Francesca Germinario <[francesca@warrenkashwarren.com](mailto:francesca@warrenkashwarren.com)> wrote:

Robert—thank you for your message. To ensure that your firm has access to the full set of materials Wave served on prior counsel for Trip, I have included the link to the service documents below:

<https://ilawco.box.com/s/xbqmpcjpq3a3nkfdc5cmbj4o5ihmcbn4>

Exhibit 1 contains the proposed amended allegations the cross-motion seeks. Please let me know if you have any trouble accessing the documents. Thank you for your continued time and courtesy in this matter.

Thanks,  
Francesca

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Francesca Germinario [francesca@warrenkashwarren.com](mailto:francesca@warrenkashwarren.com) +1 (415) 895-2942

On Sat, May 17, 2025 at 1:21 PM Mike Cilento <[michael@ilawco.com](mailto:michael@ilawco.com)> wrote:

Hi Robert - thanks for your email. I am looping in Jen Kash and her team at Warren Kash Warren. Jen is the lead counsel for The Wave Studio.

-Mike

**Michael D. Cilento, Esq.**

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On Sat, May 17, 2025 at 12:59 PM B. Robert Liu, Esq. <[robert.liu@balancelawfirm.com](mailto:robert.liu@balancelawfirm.com)> wrote:

Hi Michael,

As you know, the Balance Law Firm has entered our appearance into this case. I look forward to working with you on this matter.

I understand that Plaintiff has filed a cross-motion to amend the complaint, but I do not have a copy of the proposed amended complaint. Can you please send me a copy of the proposed amended complaint?

Just to give you a heads up, based on our review of the cross motion papers that we have, we likely will be amenable to stipulating to the amended complaint but we want to see the proposed amended complaint first, with redlining to show Plaintiff's proposed amendments. We reserve the right to move to dismiss.

Thank you and all the best,

Robert

B. Robert Liu, Esq.

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